

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

ROWENA WAGNER,  
Plaintiff

Case No. 04-264 Erie

CRAWFORD CENTRAL SCHOOL DISTRICT;  
CRAWFORD CENTRAL SCHOOL BOARD;  
MICHAEL E. DOLECKI, SUPERINTENDENT;  
CHARLES E. HELLER, III, ASSISTANT  
SUPERINTENDENT,  
Defendants

and

THE CRAWFORD CENTRAL EDUCATION  
ASSOCIATION,  
Defendant

Defendant

Reported by Sondra A. Black  
Ferguson & Holdnack Reporting, Inc.

1 do yours now.

2 MS. WAGNER: I only have one.

3

4 CROSS-EXAMINATION

5 BY MS. WAGNER:

6

7 Q. You testified, Mr. Byrd, that you knew that there  
8 were qualified applicants who were not hired and it was a  
9 continuing problem.

10 A. Um-hum.

11 Q. Can you identify those applicants?

12 A. Sure. Tammy Foster -- can I see that list, please.  
13 She's the only one on here. Eric Brown, Walt Moody, Hazel  
14 Moody, Tracey Balsamo, Lee McFerren. That's all I can think  
15 of off the top of my head.

16 Q. Do you know them all personally?

17 A. Yes, I do.

18 Q. Do you know their educational backgrounds?

19 A. Completely, no. But to the extent that they were  
20 qualified, yes.

21 Q. You know they were qualified, but you don't know  
22 their educational background; is that correct?

23 A. As related to their certification?

24 Q. I'm just asking you about their education. You said  
25 you don't know their educational background.

A. Well, let me qualify that by saying, they all graduated, they were all certified to teach at the grade levels they were certified in, and for the subjects they were certified in. That much is what I know about their qualifications.

MS. WAGNER: Thank you.

MR. KUHAR: I need a minute or maybe two.

MR. NICHOLS: We'll go off the record then for five minutes.

10 (Pause in the proceedings.)

11 MR. NICHOLS: It's now 25 after 3:00, and I've  
12 pretty much concluded questions I wanted to pose to  
13 Mr. Byrd. We're back on the record. Mr. Kuhar,  
14 Ms. Wagner, do you have questions?

15 MR. KUHAR: I do.

## CROSS-EXAMINATION

18 BY MR. KUHAR:

20 Q. Mr. Byrd, as you know, I represent the Defendants,  
21 except for the Education Association, which is represented by  
22 Ms. Wagner.

23 A. Right.

24 Q. Some of my questions may sound similar to the ones  
25 that you were asked before. Bear with me if that's the case.